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2 Presented to the Court by the foreman of the
3 Grand Jury in open Court, in the presence of
4 the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

5 FEBRUARY 11 2015
6 By WILLIAM M. McCOOL, Clerk
7 ~~UNITED STATES DISTRICT COURT FOR THE~~
8 ~~WESTERN DISTRICT OF WASHINGTON~~
~~AT SEATTLE~~

9 UNITED STATES OF AMERICA,

CR 15 NO. 029 RAT

10 Plaintiff,

INDICTMENT

11 v.

12 BRIAN RICHARD FARRELL,
13 a/k/a "DoctorClu,"

14 Defendant.

15
16 The Grand Jury charges that:

17
18 **COUNT 1**
(Conspiracy to Distribute Cocaine, Heroin, and Methamphetamine)

19 Beginning at a time unknown, but within the last five years, and ending on or
20 about December 2014, in Bellevue, within the Western District of Washington, and
21 elsewhere, BRIAN RICHARD FARRELL, and others known and unknown, knowingly
22 and intentionally did conspire to distribute substances controlled under Title 21, United
23 States Code, Section 812, Schedules I and II, including cocaine, heroin, and
24 methamphetamine, contrary to the provisions of Title 21, United States Code, Section
25 841(a)(1).

26 It is further alleged that, with respect to defendant BRIAN RICHARD FARRELL,
27 his conduct as a member of the conspiracy charged in Count 1, which includes the

1 reasonably foreseeable conduct of other members of the narcotics conspiracy charged in
2 Count 1, involved one kilogram or more of a mixture or substance containing heroin, 500
3 grams or more of a mixture or substance containing a detectable amount of
4 methamphetamine, and 5 kilograms or more of a mixture and substance containing a
5 detectable amount of cocaine.

6 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
7 and 846.

8 **ASSET FORFEITURE ALLEGATION**

9 Upon conviction of the offense alleged in Count 1 of the Indictment, the
10 defendant, BRIAN RICHARD FARRELL, shall forfeit to the United States, pursuant to
11 Title 21, United States Code, Section 853, any property constituting, or derived from, any
12 proceeds obtained, directly or indirectly, as the result of such offense, and also shall
13 forfeit any property used, or intended to be used, in any manner or part, to commit, or to
14 facilitate the commission of, such offense, including, but not limited to: \$35,000 in U.S.
15 currency, and multiple silver bullion bars, both sets of items seized on or about January 2,
16 2015.

17 If any of the above described forfeitable property, as a result of any act or
18 omission of the Defendant,

19 1. cannot be located upon the exercise of due diligence;
20 2. has been transferred or sold to, or deposited with, a third party;
21 3. has been placed beyond the jurisdiction of the Court;
22 4. has been substantially diminished in value; or
23 5. has been commingled with other property which cannot be divided
24 without difficulty;

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26 //

1 it is the intent of the United States, pursuant to Title 21, United States Code,
2 Section 853(p), to seek the forfeiture of any other property of the Defendant up to the
3 value of the above described forfeitable property.

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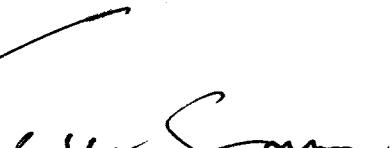
6 A TRUE BILL:

7 DATED: *11 February 2015*

8 (Signature of Foreperson redacted pursuant to
9 the policy of the Judicial Conference of the
10 United States)

11

12 FOREPERSON

13 
14 ANNETTE L. HAYES
15 Acting United States Attorney

16 
17 TODD GREENBERG
18 Assistant United States Attorney

19 
20 THOMAS M. WOODS
21 Assistant United States Attorney